

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KENOSHA ALEXANDER, STEPHANIE)	
CAMPBELL-WARD, STACEY HAMPTON)	
PATRICE JONES, SeQUOYA LESIS, and)	No. 1:18-cv-05911
CANDIS SHIELDS, on behalf of)	
themselves and similarly situated others,)	
)	
Plaintiffs,)	
)	
v.)	Magistrate Judge Cummings
)	
GREAT AMERICAN FOODS, INC., d/b/a)	
Krispy's Seafood & Chicken, TAJ HOME,)	
INC. d/b/a Shark's Fish and Chicken,)	
Abdullah Yasin and Biyad Elaga Same,)	
)	
Defendants.)	

JOINT ENTRY OF FORMAL JUDGMENT

Plaintiff, Candis Shields by and through her attorneys, Aaron B. Maduff and Daniel S. Gajda of Maduff & Maduff, LLC, and Defendants, Great American Foods, Inc., *et al.*, by and through their attorney, Mark Roth of Roth Fioretti, LLC jointly move this Court for entry of a formal judgment Plaintiff Candis Shields in the amount of \$4,297.20, and in support thereof state as follows:

1. On January 14, 2019, pursuant to Fed. R. Civ. P. 68, Defendants made an offer of judgment in the amount of \$4,297.20 plus attorneys' fees.
2. On January 22, 2019, Ms. Shields accepted the offer.
3. On February 22, 2019, Honorable Judge Sharon Johnson Coleman entered an order recognizing Plaintiff Shields acceptance of Defendants' Offer of Judgment and

ordered that judgment be entered in favor of Plaintiff Shields. However, Judge Coleman failed to formally enter the judgment.

4. Defendants are not amenable to making payment until a formal judgment is entered, and Plaintiff cannot file her petition for fees until such judgment is entered.
5. In addition, the parties are involved in settlement negotiations with a conference set before this Court on October 7, 2019 and resolving this issue is an important step in bringing the parties together because Ms. Shields herself has been waiting more than six months for payment.

WHEREFORE, the parties respectfully request that this Honorable Court enter a formal judgment in favor of Plaintiff Shields in the amount of \$4,297.20.

Respectfully submitted,

Candis Shields,

Great American Foods, Inc., *et al.*

By: /s/ Daniel Gajda

By: /s/ Mark Roth

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CERTIFICATE OF SERVICE

By my signature below, I hereby certify that on Thursday, July 11, 2019, I electronically filed the attached Motion for Summary Judgment with the Clerk of the Court by using the CM/ECF System, which will send notice to counsel of record.

Date: July 11, 2019

Respectfully Submitted,

By/s/ Daniel S. Gajda

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